

# **EXHIBIT A**

July 29-31, 2019 Email Exchange between Piers  
Tueller, Ronald Green, and Sam Castor

**From:** Sam Castor sam@switch.com  
**Subject:** Re: Switch v. Stephen Fairfax, et al.  
**Date:** July 31, 2019 at 6:15 AM  
**To:** Ron Green rdg@randazza.com  
**Cc:** Tanya Paonessa tpaonessa@switch.com, Anne-Marie Birk abirk@switch.com, Emily Shaevitz eshaevitz@switch.com, Piers R. Tueller ptueller@hutchlegal.com

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Ron,

Good morning. We weren't available when you were. We have a tight deposition stack this week.

When are you available today or tomorrow?

I won't be available today, but Piers can connect with you to close out the PO and discuss our meet and confer elements today if you're both available. If not, Em will you please schedule a call for Thursday with me and Ron and Piers?



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**From:** Ron Green <rdg@randazza.com>  
**Date:** Tuesday, July 30, 2019 at 5:17 PM  
**To:** Samuel Castor <sam@switch.com>  
**Cc:** Tanya Paonessa <tpaonessa@switch.com>, Anne-Marie Birk <abirk@switch.com>, Emily Shaevitz <eshaevitz@switch.com>, "Piers R. Tueller" <ptueller@hutchlegal.com>  
**Subject:** Re: Switch v. Stephen Fairfax, et al.

Hey guys. After I didn't receive a response to this email, I called and left a message for Piers at about 1:45 this afternoon.

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**Ronald D. Green\*** | **Randazza Legal Group, PLLC**  
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\* Licensed to practice law in Nevada.

On Jul 29, 2019, at 5:17 PM, Ron Green <[rdg@randazza.com](mailto:rdg@randazza.com)> wrote:

Gentlemen:

I will not be done preparing for my hearing tomorrow by 5:30. Again, I am free tomorrow afternoon. From the emails, I am guessing that I will be speaking with Mr. Tueller tomorrow. Is there a specific time that you would like to speak? Or should I call you when I am back in the office?

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On Jul 29, 2019, at 4:32 PM, Ron Green <[rdg@randazza.com](mailto:rdg@randazza.com)> wrote:

If I am done with my client by 5:30, I can chat for a few minutes. If not, I am available after 1:30 tomorrow. Not at 1:30.

I have not had a chance to really go through your edits to the protective order. However, I will note that

you have deleted provisions that were in the initial draft that you sent us. Those provisions would have prevented Switch from using information outside of the litigation, providing additional evidence of how Switch intends to abuse the discovery process.

Finally, frankly, I am a bit stunned that you continue to push the narrative that Defendants have waived their objections to your requests for production. You say you disagree with my "mischaracterization of the facts" but do not identify a single fact that I have allegedly mischaracterized.

Again, if I am free at 5:30, I can talk. If not, I am available for virtually the entire afternoon tomorrow.

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On Jul 29, 2019, at 4:14 PM, Sam Castor <[sam@switch.com](mailto:sam@switch.com)> wrote:

Ron,

I've attached my edits to the Protective Order. I'm available at 5:30 PM tonight if that works for you. We have been waiting for a call regarding our meet and confer and you failed to call me or schedule another call.

If tomorrow at 1:30 is the only time you are available, then I will ensure that Piers is prepared to discuss this and our meet and confer elements.

We disagree with your general mischaracterization of the facts in your response to my letter. I appreciate it may be difficult for you to recall all the facts as you were not present at the original meetings where Switch generously offered to cover costs to expedite this process. That offer has been abused. As such, we look forward to discussing these details on a call and getting access to the materials as quickly as possible. They are long overdue and your objections have been waived.

If we are unable to agree upon terms by Wednesday, we will submit our version of the Protective Orders to the Judge this Thursday.



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**From:** Ron Green <[rdg@randazza.com](mailto:rdg@randazza.com)>  
**Sent:** Monday, July 29, 2019 3:46 PM  
**To:** Tanya Paonessa <[tpaonessa@switch.com](mailto:tpaonessa@switch.com)>  
**Cc:** Anne-Marie Birk <[abirk@switch.com](mailto:abirk@switch.com)>; Emily Shaevit <[eshaevitz@switch.com](mailto:eshaevitz@switch.com)>; F. Christopher Austin <[caustin@weidemiller.com](mailto:caustin@weidemiller.com)>; Sam Castor <[sam@switch.com](mailto:sam@switch.com)>  
**Subject:** Re: FW: Switch v. Stephen Fairfax, et al.

Tanya and Emily:

I am with a client preparing for a preliminary injunction hearing in another case tomorrow morning. I am available tomorrow after the hearing has concluded. While I do not know exactly when the hearing will end, it should be safe to schedule a call anytime after 1:30.

On Mon, Jul 29, 2019 at 2:32 PM Tanya Paonessa <[tpaonessa@switch.com](mailto:tpaonessa@switch.com)> wrote:

Mr. Green,

Sam would like to discuss this matter with you today if possible. Can you please provide your availability to Emily (copied in this email)?

Thank you,

Tanya



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**From:** Ron Green <[rdg@randazza.com](mailto:rdg@randazza.com)>  
**Sent:** Thursday, July 25, 2019 5:22 PM  
**To:** Tanya Paonessa <[tpaonessa@switch.com](mailto:tpaonessa@switch.com)>  
**Cc:** Anne-Marie Birk <[abirk@switch.com](mailto:abirk@switch.com)>; Emily Shaevitz <[eshaevitz@switch.com](mailto:eshaevitz@switch.com)>; F. Christopher Austin <[caustin@weidemiller.com](mailto:caustin@weidemiller.com)>; Sam Castor <[sam@switch.com](mailto:sam@switch.com)>  
**Subject:** Re: FW: Switch v. Stephen Fairfax, et al.

Yes. We sent Mr. Castor and Ms. Bork our suggested revisions earlier this week. I don not recall offhand if it was Tuesday or Wednesday.

On Thu, Jul 25, 2019 at 4:28 PM Tanya Paonessa <[tpaonessa@switch.com](mailto:tpaonessa@switch.com)> wrote:

Mr. Green,

I'm just following up to see if you've had a chance to review the attached Stipulated Protective Order.

Thank you,  
Tanya



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**From:** Tanya Paonessa <[tpaonessa@switch.com](mailto:tpaonessa@switch.com)>  
**Sent:** Monday, July 8, 2019 9:03 AM  
**To:** Ron Green <[rdg@randazza.com](mailto:rdg@randazza.com)>  
**Cc:** F. Christopher Austin <[caustin@weidemiller.com](mailto:caustin@weidemiller.com)>; Emily Shaevitz <[eshaevitz@switch.com](mailto:eshaevitz@switch.com)>; Anna-Marie Birk <[abirk@switch.com](mailto:abirk@switch.com)>; Sam Castor

<shadytz@switch.com>, AMIR-MANIC DUK <aduk@switch.com>, Sam Castor  
<sam@switch.com>

**Subject:** Switch v. Stephen Fairfax, et al.

Mr. Green,

Per your request, attached is the Word version of the protective order.

Thank you,



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<2019.07.29 DRAFT Stipulated Protective Order RDG and SC V5 edits.docx>

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